

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Policies and Rules Concerning)

Children's Television Programming)

Revision of Programming Policies)

for Television Stations)

MM Docket No. 93-48

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REPLY COMMENTS OF NATIONAL BROADCASTING COMPANY, INC.

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SUMMARY

The Commission should reject suggestions to narrow the definition and range of programming that qualifies under the Children's Television Act. It was never the intention of Congress that only "instructional" programs could fulfill the requirements of the statute. Nor does the record in this proceeding support an about-face in the Commission's interpretation and implementation of the law, which provides for "sufficient breadth of discretion for licensee creativity."

NBC has responded to the requirements of the Children's Television Act with a five-fold increase in the amount of programming offered by the NBC Television Network that is specifically designed to educate and inform teens. These programs utilize situation comedy and sports magazine formats to attract teens to the set. Then, within these popular programming vehicles, we strive to integrate educational and informational material and messages that are relevant to teenagers. Those who want to reach teens with educational messages recognize that these programs are powerful vehicles for doing so. President Clinton will deliver a special message to teens about the dangers of cigarette smoking at the close of the November 25, 1995, episode of "Saved By The Bell," which is devoted to a story about this serious teen health problem. On October 28, 1995, Vice President Gore appeared on "NBA Inside Stuff" in connection with an event focused on preventing youth violence.

In our initial Comments, NBC supported certain procedural aspects of the Commission's proposals to clarify and strengthen the definition of "educational and informational" programming

for children. Long ago NBC adopted similar, and, indeed, more rigorous measures to ensure the educational/informational content of our children's programming. In addition, NBC tries to ensure the integration of educational and informational material and themes throughout its Saturday morning teen block programs by making extensive use of educational consultants and adhering to a rigorous review process that applies to every episode of every show.

Although we are still learning how best to merge the educational/informational and entertainment goals of our programs, NBC is engaged in a serious, ongoing effort to meet the requirements Congress articulated when it enacted the Children's Television Act. We urge the Commission not to adopt more restrictive definitions of "educational and informational" children's programming that would call programs like "Saved By The Bell" or "NBA Inside Stuff" into question, or would discount the good faith efforts of programmers and licensees to create educational and informational programming that children will watch. To do so would flatly contradict the desires of Congress and will ultimately reduce the amount of attractive and engaging educational programming available to children.

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REPLY COMMENTS OF NATIONAL BROADCASTING COMPANY, INC.

I. THE COMMISSION SHOULD REJECT SUGGESTIONS TO NARROW THE
DEFINITION AND RANGE OF PROGRAMMING THAT QUALIFIES UNDER THE
CHILDREN'S TELEVISION ACT

"Educational and informational needs encompass not only intellectual development, but also the child's emotional and social development. Prosocial programming which assists children to discover more about themselves, their families and the world would qualify."

"Programming that is provided to fulfill this obligation can certainly be designed to be entertaining to children. Indeed, one might hope that this would be the case in order to maximize the attractiveness of such content to child viewers, thereby increasing its reach and impact on America's youth."

"[P]rogramming that furthers the positive development of the child in any respect, including the child's cognitive/intellectual or emotional/social needs, can contribute to satisfying the licensee's obligation to serve the educational and informational needs of children."

"Under this legislation, the mix is left to the discretion of the broadcaster, taking into account what other stations, including noncommercial ones, are doing in this important area...[T]he Commission will continue to defer to the reasonable programming judgments of licensees in this field."

“The provision does not exclude any programming that does in fact serve the educational and informational needs of children; rather the broadcaster has discretion to meet its public service obligation in the way it deems best suited.”

These are not excerpts from Comments filed in this proceeding by broadcasters who are angling to reduce the burden of complying with the programming requirements of the Children’s Television Act of 1990 (“CTA”). Rather they are excerpts from (1) floor statements by Senators Daniel Inouye and Tim Wirth, principal sponsors of the CTA, at the time the statute was passed; (2) the Commission’s Report and Order implementing the CTA in 1991; and (3) both the House and Senate Reports accompanying the bills that were ultimately enacted as the CTA. Since 1991 television stations and networks have attempted to fulfill their responsibilities under the CTA in a manner that is consistent with the parameters of “educational and informational” programming that have been expressly articulated by Congress and the Commission. The record in this proceeding indicates that there has been a significant increase in the amount of such educational and informational children’s programming since the CTA was implemented.

The Commission is now being asked to change the ground rules under which programs qualify as fulfilling the Act’s requirements. There are those who contend that a children’s program should not be considered educational and informational unless it actually imparts result-oriented learning skills to children -- that is, teaches children to read and write. But in 1991 the Commission explicitly refused to adopt a definition of “educational and informational” that was essentially a modified version of its formerly used definition of “instructional programming,” stating that “such a narrow view would contravene the open-minded perspective taken in the

legislative history, a perspective consistent with allowing sufficient breadth of discretion for licensee creativity...”¹ Others imply that certain program formats should not qualify under the statute as “educational and informational,” a position that is contradicted by both the legislative history of the CTA and the Commission’s implementing order. Both Congress and the FCC cited to a number of programs they deemed to be educational and informational, which, under the restrictive definitions being proposed today, would suddenly not qualify.²

Dr. Karen Hill-Scott, the expert educational consultant that works with NBC on its Saturday morning teen block programs, said the following about the definition of “educational and informational” at the Commission’s June 15, 1994 en banc hearing:

“[T]he definition of what is considered educational and informational is crucial. There has been some criticism of including social/emotional content under the

¹ Report and Order in MM Docket No. 90-570, 6 FCC Rcd 2111 at par. 20 (1991). The Commission’s former rule on program log requirements contained a definition of “instructional” programming as including “that which furthers an understanding of literature, music, fine arts, history, geography, natural and social sciences.” In its proceeding implementing the statute, the Commission suggested using this category of programs, with the addition of such programs as “health-related and children’s news programs,” to define “educational and informational” programs under the CTA. See, Notice of Proposed Rulemaking in MM Docket No. 90-570, released November 30, 1990 at fn. 30. However, as noted in the text, it ultimately rejected that suggestion.

² For example, both Congress and the Commission identified NBC’s “Saved By The Bell” as an educational and informational program, noting that it dealt with “topical problems and conflicts faced by teens.” Other programs cited by the Congress and the Commission as examples of children’s programming that is educational and informational are “Fat Albert and the Cosby Kids,” “CBS Schoolbreak Specials,” “Winnie the Pooh and Friends,” “ABC Afterschool Specials,” “Life Goes On,” “The Smurfs,” “The Great Intergalactic Scientific Game Show” and “Action News for Kids.” Senate Report at 7-8; Report and Order in Docket 90-570, supra at par. 26.

education rubric because it fosters the claiming of programming with somewhat specious content. However, in every large urban market in this country, developing social competence, promoting inter-group tolerance, reducing racial and ethnic prejudice, mitigating ethnic and sex stereotypes, and instilling basic human dignity are very important keys to salvaging our nation's future. We should not let cognitive content overrule the common sense dictum to educate the whole child.

On the issue of the relationship between education and entertainment, Dr. Hill-Scott testified:

“[C]reativity...is absolutely essential to making the educational process engaging to all kinds of children. Let us not forget that educators all over the country are desperately looking for ways to push the envelope of schooling to reach disaffected learners, communicate with newcomers to this country, challenge brilliant kids, and prepare a future workforce. Pedantics alone are not the answer in the classroom, and they won't be effective in reach an audience on television, either.”

The Commission should resist suggestions to narrow the range of programs and the type of educational and informational material that fulfills a licensee's obligations under the CTA. Commission regulations should not defy what Congress intended when the Act was adopted. Nor does the record developed in this proceeding justify an about-face in the Commission's own interpretation and implementation of the law. Furthermore, a narrow approach to the type of programming that qualifies will ultimately reduce the amount of educational/informational programming on television that attracts and engages children, and therefore the amount of educational/informational programming that children will actually watch. The goals of the CTA would hardly be furthered if that were the result. As the Commission itself recognized, “the breadth of this definition...is necessary to foster the creativity that will result in programing both

beneficial and attractive to children.”³

The NBC Television Network currently provides its affiliated stations with 2 ½ hours a week of educational and informational programming for teens. Our goal from the outset has been to create programs that educate and inform as they entertain and engage these young viewers, whose educational needs are quite different from those of pre-schoolers or children who are just learning the Three R’s. Teens’ television viewing is less likely to be supervised by an adult, and they are more likely to be attracted to general audience programming available on other stations or cable channels, to movies on home video and to video games, all of which they view in large numbers. Unless this target audience is interested in watching a program, there is little point in worrying about the nature and extent of the educational material it contains. If teens don’t like a program, they will simply change the channel. The proverbial tree may fall in the forest, but no one will be there to hear it.

NBC has described the programs that comprise our educational/informational teen block, and the process we go through to ensure that each of those programs satisfies the requirements of the CTA, in some detail in previous comments filed in this proceeding. NBC’s programs and processes already meet the new criteria for “educational and informational” proposed in the Notice of Proposed Rulemaking. Indeed, NBC’s programming even meets the three-part test proposed in this proceeding by Dr. Dale Kunkle for determining whether a children’s program

³ Memorandum Opinion and Order on reconsideration in MM Docket No. 90-570 (August 26, 1991) at par. 35.

should qualify as educational: the programs have a “specified target audience that represents a sub-set of the overall child population”; the programs have “specified learning objectives or goals”; and, as Dr. Kunkle suggests, by virtue of the participation of the educational experts in the production process, the programs “have a reasonable expectation of effectiveness in accomplishing those goals or objectives.”⁴

Nevertheless, questions have recently been raised as to whether some of NBC’s programs in fact qualify as educational and informational. In order to address any remaining questions the Commission may have, we will describe those programs again in some detail, as well as our use of educational consultants in connection with those programs.

II. NBC’S TEEN BLOCK PROGRAMS QUALIFY AS “EDUCATIONAL AND INFORMATIONAL” UNDER THE CHILDREN’S TELEVISION ACT

NBC’s four Saturday morning teen block programs are presented in two basic formats. Three of the programs (“Saved By The Bell,” “California Dreams” and “Hang Time”) follow the format of a typical situation comedy. “NBA Inside Stuff” is presented in a sports magazine format. NBC uses these program formats, which are highly popular with teens, to bring our target audience to the set. Then, within these popular programming vehicles, we strive to integrate educational and informational material and messages that are relevant to teenagers. NBC does not contend that every minute of every show imparts educational or informational material. For example, “NBA Inside Stuff” typically includes some segments that contain pure

⁴ Comments of Dale Kunkle, Ph.D., pp. 8-10.

sports material, such as game scores or video of exciting plays. But we use teens' desire to see their sports heroes in action, or to follow an entertaining plot or character in the case of a sitcom format, to attract them initially to our shows. At the same time, they are exposed to the educational/informational content that is interwoven throughout the programs.

The power of NBC's teen programming as a vehicle to reach these young viewers with important educational messages has been recognized by our nation's leaders. Vice President Gore was featured in the October 28, 1995, edition of "NBA Inside Stuff," which covered his participation, along with an NBA All Star player, in a campaign to prevent youth violence program in Memphis. In discussing the problem of youth violence during the course of the segment, the Vice President said that "people kids look up to, including sports figures, have an extremely critical role to play" in conveying the importance of non-violent conflict resolution. He also acknowledged that "delivering that message in a way that they can hear it and understand it and respond to it is the best way to do it." This is precisely what "NBA Inside Stuff" is trying to accomplish: using sports heroes teens admire to deliver important and relevant educational messages in a way they can understand and relate to. Similarly, President Clinton will deliver a special message to teens about the dangers of cigarette smoking at the close of the November 25, 1995, edition of "Saved By The Bell," which is devoted to a story about this serious teen health problem.

NBC's research indicates that we have been successful in achieving the dual goals of creating programs that teens will watch and that are also educational and informational. "Saved

By The Bell,” “California Dreams” and “Hang Time” has each been the subject of cable tests in 3-4 different markets involving at least 500 children per show. The children participating in the tests were shown one of these programs in their homes via cable, and were interviewed afterwards by telephone. A significant majority (62-78%) of the teens who participated in the tests indicated that these three shows “teach some things,” and a majority of those teens who believed they learned something from the shows (61-66%) responded that they liked the fact that they teach “a lot.”

NBC tries to ensure that its teen block programs are educational and informational through extensive use of educational consultants and adherence to a deliberate process that applies to every episode of every show. Because the production requirements of the two format types are different, the processes and procedures are somewhat different as well.

Since 1993, Dr. Karen Hill-Scott has been working with the producers of “Saved By The Bell” and “California Dreams,” and has worked with the producers and writers of “Hang Time” since it premiered at the beginning of the current season. Dr. Hill-Scott was a witness at the Commission’s June 15, 1994 en banc hearing, and gave extensive testimony about the organizational process adopted by NBC to assure that the content of these programs meets educational/informational criteria. A copy of Dr. Hill-Scott’s submitted testimony is attached to these Comments (Attachment A). The process in which Dr. Hill-Scott is involved, which is more fully described in her testimony, includes the following: 1) an orientation for writers and producers before production of a show begins regarding the educational mission and the level of

effort it will take to achieve certain goals. The orientation includes a discussion of the definition of educational and informational programming which Dr. Hill-Scott believes should guide creative personnel; 2) review and discussion of the concept of each episode before development into script form; 3) review of each iteration of the script for content and meaning, with written notes and verbal feedback to the writers; 4) written articulation of the educational theme or goal of each episode, which is forwarded to NBC affiliates for inclusion in their children's programming reports. As Dr. Hill-Scott stated in her testimony:

“The network expectation from this process is that the content of both shows will have more depth and meaning for their target audience. Furthermore, the entertainment value will not be compromised by the expanded educational mission and the augmented production process...What the network believes about this programming is not that different from what children's television advocates intended. That is, the broadcast and creative community will be able to generate high quality, high content programming for the child audience. Moreover, the programming will have the production values essential to attracting an audience.”

“NBA Inside Stuff” has been on NBC's schedule for several seasons. It was only in 1994 that the National Basketball Association (“NBA”) and NBC decided cooperatively to integrate educational and informational elements into the show. And let us be clear. The educational and informational material in the show is NOT sports information. In the fall of 1994, the NBA retained Dr. Istar Schwager, a Ph. D. In Educational Psychology with a history of experience with the Children's Television Workshop, as an educational consultant to the show. Dr. Schwager developed an ongoing curriculum for the program, and she strives to have at least one curriculum goal featured in the program's educational/informational segments. The curriculum goals used in the show are based on several of the U.S. Department of Education's Goals 2000, with special

emphasis on school completion and student achievement. Most of the segments of “NBA Inside Stuff” are shot a few days before air, so Dr. Schwager provides input to the producers and writers of each episode on ways to make each show educational and informative for the target audience based on an advance review of a written “run down” of the content of each show. The segments are then shot and edited with her guidance in mind. To the extent there is in-studio scripted material, she reviews it in advance and gives the writers input to enhance the educational and informational content. Finally, she prepares a written description of the content of each educational segment, which is furnished to NBC affiliates for inclusion in their children’s programming reports.

At the beginning of the 1994-95 and 1995-96 seasons, NBC distributed a Study Guide on all four of its teen block shows to junior and senior high school English teachers across the country. The Guide invites these teachers to use the teen block programs as a complement to classroom instruction. For example, it provides teachers with reproducible class activity sheets designed to channel students’ enthusiasm for the programs and characters into a variety of creative writing projects, including journal keeping, letter writing, fiction writing, drama , news reporting and criticism. Additional copies of the Guide are furnished to NBC’s affiliated stations for distribution to other organizations in their communities.

The goal of the process described above is the integration of educational and informational material and themes throughout NBC’s Saturday morning teen block programs. Attached are the descriptions of some of the educational/informational themes or messages identified by Dr. Hill-

Scott and Dr. Schwager for these programs during the past four calendar quarters, which have been furnished to NBC's affiliates for their public files (Attachment B).⁵ "Saved By The Bell," "California Dreams" and "Hang Time" have covered such issues as violence prevention, smoking, race and gender prejudice, drug use, leadership, staying in school, learning disabilities, drinking and compulsive weight control. The educational segments of "NBA Inside Stuff" have reinforced messages about the importance of academic performance, cooperation, hard work, good health and staying in school, and the value of discipline, persistence and taking responsibility.

The process the creative teams and educational consultants go through is not an easy one; in fact, it is quite arduous. Dr. Hill-Scott, who has been at it for over two years now, testified:

"There is a challenging process of organizational change that must take place to produce qualifying programming. There are new or additional players at the creative table who are necessary collaborators for integrating educational content into commercial television for children. There is a learning curve to merging the educational and entertainment purposes effectively."

We are still on the learning curve that Dr. Hill-Scott described. We are still striving to better integrate educational and informational content into programs that attract and engage children. But while we do not yet have all the answers, NBC is engaged in a serious, ongoing effort to meet the requirements Congress articulated when it enacted the CTA, and the Commission articulated when it adopted its implementing regulations. Undoubtedly we try to

⁵ Since "NBA Inside Stuff" did not qualify as educational and informational until January, 1995, and "Hang Time" premiered on September 9, 1995, the descriptions for those programs only cover the period from those initial dates until September 30, 1995.

make the programs entertaining. But there is also little doubt that we are providing “prosocial programming which assists children to discover more about themselves, their families and the world,”⁶ and programming that “furthers the positive development of the child in any respect, including the child’s cognitive/intellectual or emotional/social needs.”⁷

III. CONCLUSION

In our October 16 Comments NBC supported certain procedural aspects of the Commission’s proposals to clarify further its definition of “educational and informational” programming which we believe will force licensees to focus more closely on the content of their qualifying shows. Long before these procedures were proposed by the Commission, NBC had independently adopted similar and, indeed, more rigorous measures to insure the educational/informational content of our children’s programming. We believe these measures have resulted in programs that are specifically designed to meet the broad range of children’s educational and informational needs contemplated by the CTA.

We urge the Commission not to adopt more restrictive definitions of “educational and informational” children’s programming that would call programs like “Saved By The Bell” or “NBA Inside Stuff” into question, or would discount the good faith efforts of programmers and licensees to create educational and informational programming that children will watch. To do so

⁶ Floor statement of Senator Daniel Inouye, July 19, 1990, 136 Cong. Rec. S 10122.

⁷ Report and Order, 6 FCC Rcd 2111 at par. 21.

would flatly contradict the desires of Congress and will ultimately reduce the amount of attractive and engaging educational programming available to children.

Respectfully submitted,

A handwritten signature in cursive script, reading "Richard Cotton".

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A handwritten signature in cursive script, reading "Howard Monderer".

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November 20, 1995

TESTIMONY OF KAREN HILL-SCOTT, ED.D
FCC EN BANC HEARING ON CHILDREN'S TELEVISION
MM DOCKET NO. 93-48
JUNE 28, 1994

SUMMARY OF TESTIMONY OF
KAREN HILL-SCOTT, ED.D
JUNE 15, 1994

As an educator and consultant to NBC for the 1994 children's television schedule, my testimony broadly addresses two issues. First is defining educational and informational programming for children. Second, is describing an organizational process for assuring that the content of children's programming can meet the educational criteria. The main points in this testimony are that:

- breadth in the definition of what is considered educational and informational remains important;
- broadcasters and the creative community genuinely need to have some flexibility in determining how to present educational and informational content, and in what format;
- broadcasters need to apply their creativity to the development of processes which assure fidelity to the intent of the Children's Television Act (CTA);
- broadcasters need to substantially and clearly illustrate how programming intended to qualify under the CTA does, in fact, meet that station's criteria for educational and informational programming.

If taken seriously, the Act should signal a change in the way some children's television is produced. Each broadcaster planning to behave in accordance with the intent of the Act ought to articulate a definition of educational and informational programming and implement a companion production process to achieve the goals of its expanded mission.

Last Fall, 1993, I began working with NBC to develop such a process for their children's programming efforts. Two of its regularly scheduled standard length programs, Saved By The Bell,

and California Dreams, in addition to Name Your Adventure, are slated to qualify under the Act. My work has been to develop a definition of educational and informational programming which would guide creative personnel in their work. Secondly, I am also responsible for implementing a review process which follows every show from its concept to final tape.

The definition which is being applied to these three shows contains several elements, including that the content of the show be developmentally appropriate, that the educational information be integral to the plot of the episode and that the episode should take the viewer's understanding from one level to another. Examples of how this definition is operationalized are presented in the body of the testimony.

However, the more substantial work is in translating this definition into the substance of programming. The process underway at NBC includes an orientation for writers and producers regarding the educational mission and the level of effort it will take to achieve certain goals. Second, each concept is reviewed before development into script form. Each iteration of the script is reviewed for content and meaning and modified. Finally, companion materials will be written for each episode which articulate the educational goal and how the goal is developed in the story. The result of this process should produce greater clarity and make

explicit the educational and information purposes within each episode of the series. The network also expects the entertainment value will not be compromised by the expanded educational mission and the augmented production process in each of these series. Ultimately, producing better quality and more informational children's television will be the result of collaboration and exchange between the child development and the television producing communities. This will be a far superior method for meeting educational goals than other approaches which may be under consideration, including a government-imposed definition of what is "educational."

TESTIMONY OF KAREN-HILL SCOTT, ED.D.

LOS ANGELES, CALIFORNIA

JUNE 15, 1994

I am Dr. Karen Hill-Scott, testifying today as an independent consultant to NBC. My academic training is in child development, and my professional experience in the field goes back almost thirty years, beginning as a teacher in the first Head Start program in Los Angeles County. While my testimony has a specific focus on definition and compliance issues, my perspective in this hearing is shaped by several broad influences. As a child development specialist, I am committed to advancing the priorities of children in both public policy and service delivery. I am a practitioner who founded a large child development agency 15 years ago, and have contact with thousands of real parents and their children trying to make a go of it in very difficult times. I am a professional who has worked over the past ten years with both public television and commercial television producers on challenging and difficult program concepts. This combination of background and experience gives me a perspective on the issues which balances the practical realities of changing how an industry does its work against my need as an advocate to create changes which improve the lives of children.

The Commission has requested comments on the definition of informational and educational programming. The Children's Television Act very broadly defined educational and informational programming as that "which furthers the positive development of the

child in any respect, including serving the child's cognitive/intellectual or social/emotional needs" FCC Children's Report and Order, 6 FCC Rcd 2111, 21114 (1991). This language demonstrated a clear desire on the part of the Congress to permit the broadcasters flexibility and creativity in meeting these educational goals. The absence of specificity in the language of the Act and the data from the limited number of license applications surveyed thus far, conversely suggests that translating the Congressional intent into practice may need both guidance and support.

Last May 1993 in The Los Angeles Times, Margaret Loesch, representing the Fox Network, made the statement "we are not teachers or educators; we're in the entertainment business." From an advocate's position, it is easy to be both dismissive and critical of this position as simply shirking an ethical responsibility to rise above and/or risk going beyond proven commercial product.

In practice, however, Ms. Loesch's one-liner belies the complex challenge which is presented by transforming commercial programming into educational programming. Most of the history of broadcast television is built around the nexus of commerce and entertainment, not a nexus between communication and learning. The Children's Television Act, if taken seriously, does not mean that a broadcaster can simply add or modify a few procedures. It signals a fundamental change in the way some children's television is produced.

Meeting this challenge is not as simple as a government bureaucracy stating such programming should exist, nor is it as simple as implementing a directive from the Commission, such as the successful limits on advertising. Creating educational and informational television requires a shared understanding of what educational and informational means, a plan for what would work in a given broadcast area, and a production process that involves broadcast management, producers, writers and childhood educators.

To attain successful implementation of the letter and spirit of the Act, it is far more important that broadcasters develop approaches that merge the creative process with the educative process than it is for the government to promulgate unilateral rules which may be infeasible to implement in every broadcast market. It was certainly not the intent of the Act to replace lowest common denominator entertainment programming with lowest common denominator educational programming. Audience retention is just as important as audience education and it takes the creative side of television to attract audience, while it may take assistance from the child development community to infuse that programming with educational content.

This brings me to a description of the process developed this season by NBC, which intends for its regularly scheduled standard length programs, including Saved By the Bell, California Dreams and Name Your Adventure, to qualify under the Act. NBC has retained me to help develop and implement this process. Before production of either show could begin, it was important for the network to have

a sense of what would qualify as educational and informational programming. Definition came first. Then a monitoring and review process was put in place so the shows would have continuous input to assure that the educational/informational message was adequately presented in each episode.

THE DEFINITION OF EDUCATIONAL/INFORMATIONAL

With regard to the definition I would like to assert that breadth in the definition of what is considered educational and informational is crucial. There has been some criticism of including social/emotional content under the education rubric because it fosters the claiming of programming with somewhat specious content. However, in every large urban market in this country, developing social competence, promoting inter-group tolerance, reducing racial and ethnic prejudice, mitigating ethnic and sex stereotypes, and instilling basic human dignity are very important keys to salvaging our nation's future. We should not let cognitive content overrule the common sense dictum to educate the whole child.

Another issue on definition is establishing a primary/secondary relationship between the entertainment/education purposes. Consistent with testimony given to the Commission by the Children's Television Workshop (Docket No. 93-48, May 1993), I want to assert, unequivocally, that this is a false dichotomy. It will have a chilling effect on the creativity which is absolutely essential to making the educational process engaging to all kinds of children.